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March 18, 2020

BY ECF

Hon. Vernon S. Broderick, U.S.D.J. Thurgood Marshall United States Courthouse 40 Foley Square, Room 415 New York, NY 10007

Re: Michael Grecco Prods., Inc. et al. v. Guardian News and Media LLC,

No. 1:19-cv-05672-VSB

Response to Plaintiffs' Letter Motion To Reopen Case

Dear Judge Broderick:

On behalf of Defendant Guardian News and Media LLC ("GNM"), we write to respond to Plaintiffs' letter motion to reopen this case.

We have been communicating with Plaintiffs' counsel, Stuart Weichsel, concerning the status of the settlement payment. GNM initiated the wire transfer to the bank account information provided by Mr. Weichsel from its bank in the United Kingdom on March 10, 2020. We have since forwarded that information to Mr. Weichsel.

We further understand that Plaintiffs were required to file their letter motion to preserve their position in the event of non-payment. But we expect the transfer to process shortly, and will file a Stipulation of Discontinuance when payment is confirmed.

Respectfully submitted,

/s/David S. Korzenik
David S. Korzenik

cc: Counsel of record via ECF